

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

**JOE JESSE MONGE and
ROSANA ELENA MONGE,
Debtors.**

CASE NO. 09-30881-lmc

CHAPTER 11

**APPLICATION TO EMPLOY STEVEN A. ROTH CPA
AS ACCOUNTANT FOR DEBTOR-IN-POSSESSION**

TO THE HONORABLE LEIF M. CLARK, UNITED STATES BANKRUPTCY JUDGE:

**THIS PLEADING REQUESTS RELIEF WHICH MAY BE ADVERSE TO YOUR
INTEREST**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN
MAY BE GRANTED WITHOUT A HEARING BEING HELD
A TIMELY RESPONSE IS NECESSARY FOR A HEARING TO BE HELD:**

COMES NOW, Joe Jesse Monge and Rosana Elena Monge, Debtors in this case and files this Application to Approve the Employment of Steven A. Roth, CPA, as the accountant for Debtors as Debtors-In-Possession and would respectfully show the Court as follows:

1. The Debtors filed a Petition for Relief under Chapter 11 of Title 11 on April 27, 2009, in the above captioned case.
2. The Debtors have continued in possession of their property and, as Debtors-in-Possession are now operating their business and managing their property pursuant to the provisions of 11 USC § 1101.
3. The Debtors, as Debtors-in-Possession, have employed Steven A. Roth, CPA as their regular accountant, subject to Court approval, at the hourly rates set forth on Exhibit "A" attached hereto.

4. The Debtors have selected this accountant for the reasons that this accountant has considerable experience in matters of this character, and the Debtors believe that this accountant is well qualified to represent them as Debtors-in-Possession in this case.

5. The professional services to be performed by this accountant are:

- a) To prepare appropriate tax returns for the Debtors;
- b) To aid the Debtors' attorneys in all negotiations; and,
- c) To perform all of the accounting services for the Debtors as Debtors-in-Possession which may be necessary herein.

6. It is necessary for the Debtors, as Debtors-in-Possession, to employ Steven A. Roth, CPA an accountant to perform the professional services described in the preceding paragraph.

7. To the best of Debtors' knowledge, Steven A. Roth, CPA has no connection with the creditors or any other party in interest of the Debtors-in-Possession, other than as set forth in the attached Exhibit "B".

8. It is necessary and essential that the Debtors-in-Possession employ, Steven A. Roth to be employed with compensation as approved by the Court upon application for allowance of payment of fees and expenses.

9. Steven A. Roth, CPA represents no interest adverse to the Debtors as Debtors-in-Possession or to the estate in matters upon which he is to be engaged by the Debtors, and Debtors' employment of this attorney would be in the best interest of this estate except as set forth on Exhibit "B."


10. The Debtors-in-Possession have not paid a retainer to Steven A. Roth, CPA.

WHEREFORE, the Debtors pray:

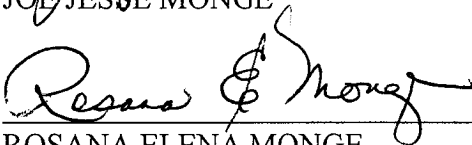
1. That the employment of Steven A. Roth, CPA to represent the Debtors-in-Possession, on an hourly basis as set forth on Exhibit "A" be approved; and,
2. For such other and further relief as the Debtors may show themselves to be justly entitled.

DATED: April 9, 2010.

Respectfully submitted,



JOE JESSE MONGE



ROSANA ELENA MONGE

CERTIFICATE OF SERVICE

I, Sidney J. Diamond, do hereby certify that on April 9, 2010, a true and correct copy of the foregoing Application to Employ Steven A. Roth, CPA as Accountant for the Debtors-In-Possession was served, by depositing the same in the United States Mail, properly addressed and postage prepaid, or by fax or email as noted, to the following parties:

THE DEBTORS:

Joe Jesse & Rosana Elena Monge
51 Sierra Crest Dr..
El Paso, TX 79902

UNITED STATES TRUSTEE:

Kevin Epstein
Office of the U.S. Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

VIA EMAIL: USTPRegion07.SN.ECF@usdoj.gov

PARTIES IN INTEREST PREVIOUSLY REQUESTING NOTICE:

David Alvoet
Linebarger, Goggan, Blair & Sampsom, LLP
711 Navarro, Suite 300
San Antonio, TX 78205
Attorney for City of El Paso

Carlos A. Miranda, III
5915 Silver Springs, Bldg. 3A
El Paso, TX 79912
Attorney for El Paso Area Teachers FCU

Lance C. Reedman
4171 N. Mesa St., Suite B-201
El Paso, TX 79902
Attorney for Francisco Jayme & Alicia Rojas

**ALL CREDITORS AND PARTIES IN INTEREST ON THE COURT'S MATRIX
ATTACHED HERETO AS EXHIBIT "C":**

/s/ Sidney J. Diamond
Sidney J. Diamond

EXHIBIT "A"**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION****IN RE:****JOE JESSE MONGE and
ROSANA ELENA MONGE,****Debtors.****CASE NO. 09-30881-lmc****CHAPTER 11****STEVEN A. ROTH, CPA****HOURLY RATES:**

Steven A. Roth, CPA,	\$150.00 per hour
Secretary	\$ 80.00 per hour
Postage	Actual
Copies	\$0.10/page
Mileage	Federal Rate, Currently \$0.55/mile

EXHIBIT "A" & "B"

EXHIBIT "B"

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

AFFIDAVIT OF ST ROTH

THE STATE OF CALIFORNIA §
 §
COUNTY OF §


Steven A. Roth, CPA, being duly sworn, deposes and says as follows:

1. **QUALIFICATIONS:** I am a Certified Public Accountant, duly licensed to practice in the State of California .

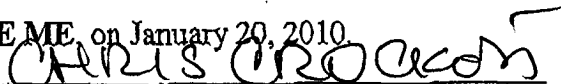
2. **OFFICE:** I maintain an office at N. Bloomfield Road, Nevada, CA 95959, and my telephone number is (530) 478-5696, fax number (530)478-5696.

3. **CONNECTION WITH DEBTOR:** I have not previously been employed as accountant for Joe Jesse Monge and Rosana Elena Monge, the Debtors in this case and have prepared their tax returns. I have no connection with Joe Jesse Monge and Rosana Elena Monge, the Debtor in this case, their creditors or any other party in interest herein, their respective attorneys or accountants.

4. **NO ADVERSE INTEREST:** I represent no interest adverse to the Debtors herein, or their estate in the matters upon which I am to be engaged.

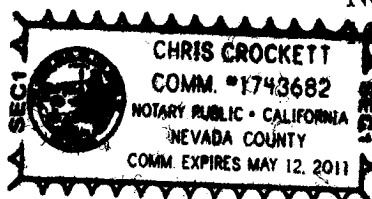

Steven A. Roth, CPA

SUBSCRIBED AND SWORN TO BEFORE ME, on January 20, 2010.


Notary Public for the State of California

My Commission Expires: MAY 12 2011

EXHIBIT "A" & "B"



AAFES/Military Star/Exchange
Attention: Bankruptcy
PO Box 740933
Dallas, TX 75374

City of El Paso Tax Assessor Co
c/o Linebarger, Goggan Blair &
711 Navarro, Ste. 200
San Antonio, TX 78205

INTERNAL REVENUE SERVICE
300 E. 8TH ST. STOP 5026AUS
AUSTIN, TX 78701

Alicia Rojas
105 Thoroughbred
Santa Teresa, NM 88008

City of El Paso Tax Assessor/Co
P. O. Box 2992
El Paso, TX 79999-2992

IRS - Special Procedures Staff
Stop 5022 AUS
300 E. 8th Street
Austin, TX 78701

Ascension Capital Group, Inc.
Attn: Onyx Acceptance Corp.
for Capital One Auto Finance
P. O. Box 201347
Arlington, TX 76006

Countrywide Home Lending
Attention: Bankruptcy SV-314B
PO Box 5170
Simi Valley, CA 93062

Javier Francisco Jayme
105 Thoroughbred
Santa Teresa, NM 88008

AT&T
Attn: Bankruptcy Dept
P O Box 57907
Salt Lake City, UT 84157

Credit Management
4200 International Pwy
Carrollton, TX 75007

Joe Jesse Monge
51 Sierra Crest Dr.
El Paso, TX 79902

Bernardo Vela
317 Poplar Ct
Sunland Park, NM 88063

Dona Ana County
David Gutierrez, Treasurer
Property Tax Assessor
845 N. Motel Blvd.
Las Cruces, NM 88007

Kevin Epstein
United States Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

Bill Issac
5880 Kingfield Ave
El Paso, TX 79912

El Paso Area Teachers Federal C
c/o Linda Aldeis, Collections M
12020 Rojas Drive
El Paso, TX 79930

Lease Finance Group, LLC
132 West 31st St., 14th Floor
New York, NY 10011

Carlos Mata
5019 Alabama
El Paso, TX 79930

Guevara Baumann Coldwell Reedma
4171 N. Mesa Street, Ste. B-201
El Paso, TX 79902

LFG Lease Finance Group, LLC
P. O. Box 1027
Sioux Falls, SD 57101

Carlos Rivera Mata
6733 Morningside Circle
El Paso, TX 79904

Hector Phillips, P.C.
1017 Montana Avenue
El Paso, Texas 79902

Linebarger, Goggan Blair & Sam
711 Navarro, Ste. 200
San Antonio, TX 78205
Attn: David G. Aelvoet
Attn: Don Stecker

Citi
Attn: Centralized Bankruptcy
PO Box 20507
Kansas City, MO 64915

Hudspeth Appraisal District
P. O. Box 429
Sierra Blanca, TX 79851

Los Ranchos Del Rio
Property Owners Assoc.
P. O. Box 2914
SUNLAND PARK, NM 88063

City of El Paso
El Paso Tax Assessor/Collector
PO Box 2992
El Paso, TX 79999-2992

Hugo Maynez Maldonado
5401 Thread Gill
El Paso, TX 79924

Margarita Maria Mata Flores
5019 Alabama
El Paso, TX 79930

EXHIBIT **A**

Metal Buidling Specialites, LLC
c/o Alfonso L. Flores

Sitework Engineering
444 Executive Center, Ste. 134
El Paso, TX 79902

Verizon Wireless
15900 Se Eastgate Way
Bellevue, WA 98008

New Century Mortgage Corp.
c/o BAC Home Loans Servicing
7105 Corporate Drive
PTX-B-35
Plano, TX 75024

Southwest Credit Systems, L.P.
5910 W Plano Parkway, Suite 100
Plano, TX 75093-4638

Verizon Wireless West
PO Box 3397
Bloomington, IL 61702

New Century Mortgage Corp.
c/o BAC Home Loans Servicing LP
7105 Corporate Drive PTX-B-35
Plano, TX 75024

Speesoil Inc.
3600 Esper Drive
El Paso, TX 79936

Wyndham Vacation Resorts
10750 W. Charleston Blvd, Ste 1
Las Vegas, NV 89135

New York Life Ins. Co.
PO Box 130539
Dallas, TX 75313

State Farm Insurance Companies
PO Box 2329
Bloomington, IL 61702-2329

Wyndham Vacation Resorts
P. O. Box 3630
Boston, MA 02241

Onyx Acceptance Corp.
c/o Ascension Capital Group
PO Box 201347
Arlington, TX 76006

State Farm Lloyds
8900 Amberglen Blvd.
Austin, TX 78729

Wyndham Vacation Resorts
10750 W. Charleston Blvd Ste 1
Las Vegas, NV 89135

Pablo Aguirre
1012 Chiricahua Dr.
El Paso, TX 79912

State of New Mexico
Taxation and Revenue Dept.
PO Box 8575
Albuquerque, NM 87198-8575

Pablo Aguirre Jr.
1012 Chiricahua Dr.
El Paso, TX 79912

State of New Mexico
Taxation and Revenue Department
PO Box 8390
Santa Fe, NM 87504-8390

Polk, Prober & Raphael
A Law Corporation
20750 Ventura Blvd. #100
Woodland Hills, CA 91364
Attn: Dean Prober, Esq.

Sysco
601 Comanche Rd. N.E.
Albuquerque, NM 87125

Ramesh Singh
Recovery Management Systems
25 SE 2nd Ave, Ste. 1120
Miami, FL 33131

U.S. Attorney
FHZ/HUD/VA/IRS
601 N.W. Loop 410, Suite 600
San Antonio, TX 78216

Rosana Elena Monge
51 Sierra Crest Dr.
El Paso, TX 79902

Vacation Break Resorts & Club
Star Island Condominium Associa
P. O. Box 850001
Orlando, FL 32885